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COMMENT

Subject: Forex Retail Market... Leave Leverage Alone

Re: CFTC 1:10 Forex Leverage Proposal.

As I read it, the CFTC 1:10 Forex Leverage Proposal is MISGUIDED. It appears to me that the CFTC does NOT understand Retail Forex market trading and where money management 'Risk' can become hazardous to Retail Forex trading.

The stated intent of the CFTC proposal is to protect retail traders from RISK.

However, what the CFTC is proposing 'INCREASES' the retail traders 'RISK' by a factor of '10 TIMES'.

The math goes this way:

At the current 1:100 leverage, for each \$100.00 of his/her out of pocket Capital Investment RISK EXPOSURE the trader is entitled to trade \$10,000.00 worth of currencies.

At the proposed 1:10 leverage, the trader is entitled to trade THE SAME \$10,000.00 worth of currencies but his/her out of pocket Capital Investment RISK EXPOSURE is increased \$1,000.00 as opposed to \$100.00.

The CFTC proposal 'INCREASES' out of pocket Capital Investment RISK EXPOSURE by '10 TIMES MORE RISK'

Clearly something is wrong with the proposal; It is either terribly misguided or worse.

How would the retail trader's EXPOSURE TO RISK be REDUCED?

What is the common sense answer that is being overlooked?

Reducing LEVERAGE from 1:100 to 1:10 is NOT the answer. The proposal as it stands is a disaster-in-waiting for retail traders.

In order to protect the new/naive/self destructive and or otherwise uneducated trader from him or herself, ACCOUNT MARGIN LIMITATIONS should be Revised so that the trader's out of pocket Capital Investment RISK EXPOSURE is never any greater than 5% or 10% of his/her trading account at any time.

Leave leverage alone. 'LEVERAGE IS NEITHER THE PROBLEM NOR THE SOLUTION.'

The answer to RISK EXPOSURE is NOT LEVERAGE CONTROL. In fact LEVERAGE CONTROL would have the exact OPPOSITE effect by INCREASING RISK - 'TEN FOLD'...

The answer is 'MARGIN CONTROL'.

Roy Halpin

Received CFTC
Records Section
1/26/2010

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2010 JAN 26 AM 8 53
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